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February 27, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: *Sanchez v. EZ Parking Corp., et al.*
Case No.: 1:23-cv-4052 (AMD) (VMS)

Dear Judge Scanlon:

This firm represents Defendant EK Premier Services LLC (“EK Premier”) in the above-referenced case. EK Premier writes jointly with all appearing parties to respectfully request an extension of time to complete certain discovery items further outlined below. Namely, the parties seek a thirty (30) day extension of time to respond to discovery demands by March 1, 2024 and complete Plaintiff’s deposition by March 29, 2024.

On December 4, 2023, this Court so-Ordered the parties’ joint proposed discovery schedule which was submitted on December 2, 2023. See ECF Docket Entry [20](#); see also Text Only Order dated December 4, 2023.

Pursuant to ¶ II(b) of this Court’s Individual Practice Rules: (i) the original date of the deadline to respond to discovery demands and complete Plaintiff’s deposition is January 31, 2024 and February 28, 2024, respectively; (ii) there have been no previous requests to extend these deadlines; (iii) the appearing parties join in this motion; (iv) the reason for the request is because the parties need additional time to serve responses to discovery demands due to deadlines in other cases and because your undersigned recently separated from employment and is in the process of setting up his practice; (v) no suggested adjournment dates are necessary for this request; and (vi) the parties anticipate meeting the remaining deadlines set forth in the so-Ordered discovery schedule.

In light of the foregoing, the parties respectfully submit that both good cause and excusable neglect¹ exists sufficient for this Court to exercise its discretion in favor of granting the requested extensions of time. See Fed. R. Civ. P. 6(b)(1)(B). The parties thank this Court for its time and attention to this case.

¹ Your undersigned was unable to earlier submit this joint letter motion because he conducted an evidentiary hearing before the Hon. James M. Wicks, U.S.M.J. on Tuesday, February 20, 2024, which hearing took substantial time to prepare for. Thereafter, it took time for the multiple parties involved to review, revise, and ultimately join in this motion.

Dated: Jamaica, New York
February 27, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

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